REMARKS

Below, the applicant's comments are preceded by related remarks of the examiner set forth in small bold font.

2. Claims 1, 5, 7, 13, 14, 20, 21, 25, 26, 29, 31-33, and 39 are rejected under 35 USC 103(a) as being unpatentable over Coile (US 6,298,063) in view of Terry (US 6,587,473).

Regarding claims 1 and 21, Coile teaches a method and apparatus for a computer telephony system (fig. 1). The computer telephony platforms have resources that provide computer telephony services (fig. 1 box 102, 104).

There are service modules (fig. 1 box 112 A, B, C) residing on each of the platforms (fig. 1 box 112), wherein the service modules manipulate the resources according to platform-dependent protocols (TCP, col. 4 lines 14-15) to facilitate performance of computer telephony services for other service modules (servers are connected to one another, col. 4 lines 23-25), and communication among service modules uses packets (col. 4 lines 23-25).

There is inter-platform packet router (fig. 1 box 104) associated with the inter-platform interface, the inter-platform router routing message packets having inter-platform destination addresses (fig. 1 box 102).

Regarding claims 1 and 21, although Coile teaches the servers (fig. 1 box 112A-C) are connected to one another (col. 4 lines 23-25), the inventor fails to explicitly state communication among the service modules using message packets having a common, platform-independent protocol, an intra platform packet router for routing packets originating from a platform on which the intra-platform packet router resides and having an intra-platform destination address to a service module residing on the platform, the inter-platform packet router receiving from the intra-platform routers to one of the intra-platform routers residing on one of the platforms on which the service modules indicated by the inter-platform address reside.

Regarding claim 7, Coile teaches service modules (fig. 1 box 112A-C) to manipulate resource to facilitate the performance of computer telephony services for other service modules (servers are connected to one another, col. 4 lines 23-25), and each of the service modules manipulates one of the resources according to one of a plurality of diverse protocols (TCP, FTP, col. 4 lines 14-25), and a packet router configured to route the message packets to the service modules based on a destination address included in the packet (fig. 1 box 200).

Regarding claims 14, 26, and 31, Coile teaches computer telephony platforms (fig. 1 box 104, 200, and 112) and service modules (fig. 1 box 112A-C) residing on the platforms, one of the service modules accessing resources on the platform according to one of a plurality of platform-dependent protocols (TCP, FTP, col. 4 lines 14-25) to facilitate performance of computer telephony services for other service modules (servers are connected to one another, col. 4 lines 14-25).

Regarding claim 33, controlling each of the service modules with the service requests to manipulate the resources of platform-dependent protocols to facilitate performance of the computer telephony services (col. 4 lines 23-25).

Regarding independent claims 1 and 21, Terry teaches an intra platform packet router (fig. 3 box 38) for routing packets originating from a platform (fig. 3 box 34, 34')on which the intra-platform packet router resides and having an intra-platform destination address to a service platform, the inter-platform packet router receiving from the intra-platform routers module residing on the (fig. 3 box 40) to one of the intra-platform routers residing on one of the platforms on which the service modules indicated by the inter-platform address reside.

Therefore it would have been obvious to one of ordinary skill in the art, having both Coile and Terry before him/her and with the teachings [a] as shown by Coile, a method and apparatus for (a) computer telephony system, and (b) as shown by Terry, an intra platform packet router for routing packets originating from a platform on which the intra-platform packet router resides and having an intra-platform destination address to a service module residing on the platform, the inter-platform packet router receiving from the intra-platform routers to one of the intra-platform routers residing on one of the platforms on which the service modules indicated by the inter-platform address reside, to be motivated to modify the system of Coile by incorporating the bridge function of Terry (fig. 1 box 38, col. 7 lines 24-26) within the local director (fig. 1 box 200) of Coile. This modification can be performed in hardware. This would improve the system of Coile since bridges are proven, reliable devices for routing packets within a network.

Regarding claims 1, 7, 14, 21, 26, 31, and 33, although Coile teaches the servers (fig. 1 box 112A-C) are connected to one another (col. 4 lines 23 -24, the inventor fails to explicitly state communication among the service modules using message packets communicated according to a common, platform-independent protocol.

The examiner takes official notice that it would have been obvious to one skilled in the art to perform communication among the service modules using message packets communicated according to common, platform-independent protocol. The service modules are (fig. 1 box 112A-C) can be viewed as a private network. Communication between the servers would not be dependent upon accessing hardware outside the domain of the private network. Therefore, the system designer would be free to write software tailor made for transmitting information between the servers. This would be of benefit since the designer would be able to optimize the software to fit his specific needs.

As discussed in the telephone interview dated February 2, 2004, Coile does not disclose or suggest that "service modules manipulate the resources according to platform-dependent protocols to facilitate performance of the computer telephony services for other service modules," and that "communication among the service modules uses message packets having a common, platform-independent protocol," as

Applicant : Luis Ortiz et al.
Serial No. : 09/267,178
Filed : March 12, 1999
Page : 13 of 14

recited in claim 1.

Coile discloses that "the group of TCP based servers 112 may be World Wide Web servers, FTP servers, mail servers, news servers, database servers, Telnet servers, etc. (col. 4, lines 19-21)." Coile does not disclose or suggest that the servers 112 "manipulate the resources according to platform-dependent protocols to facilitate performance of the computer telephony services for other service modules."

While Coile discloses that "[s]ervers 112A, 112B, and 112C as well as other servers and devices are connected to one another through a network cable 114 (col. 4, lines 23-25)," Coile does not disclose or suggest that there is communication among servers 112A, 112B, and 112C. The fact that the servers 112A-112C are connected to a network cable 114 merely shows that the servers 112A-112C can send (and receive) message packets to (and from) the Local Director 200.

What is lacking in Coile is also not disclosed or suggested in Terry.

Claims 2-6 and 14-40 are patentable for at least the same reasons as claim 1. The examiner acknowledged that the claims would be patentable over Coile and Terry and indicated that he may do more searching based on his understanding of the claims.

Similar to the reasons discussed above, "service modules configured to manipulate resources to facilitate the performance of computer telephony services for other service modules, wherein communication among the service modules uses message packets having a common protocol, and each of the service modules manipulates one of the resources according to one of a plurality of diverse protocols" (emphasis added), as recited in claim 7, would not have been made obvious by Coile and Terry.

Claims 8-11 and 13 are patentable for at least the same reasons as claim 7.

The applicant submits a Petition for Three Month Extension of Time. Please apply the required fee of $950, and any other charges to deposit account 06-1050, referencing attorney docket 02324-019001.

Applicant : Luis Ortiz et al.   Attorney Docket: 02324–019001
Serial No. : 09/267,178
Filed   : March 12, 1999
Page   : 14 of 14

Respectfully submitted,

Date: _Feb. 9, 2004_ _____   _Rex Huang_ _____

                                       Rex I. Huang* for
                                       David L. Feigenbaum, Reg. No. 30,378

Fish & Richardson P.C.
225 Franklin Street
Boston, MA 02110-2804
Telephone: (617) 542-5070
Facsimile: (617) 542-8906

See attached document certifying that Rex Huang has limited recognition to practice before the U.S. Patent and Trademark Office under 37 CFR § 10.9(b).
20724397.doc

BEFORE THE OFFICE OF ENROLLMENT AND DISCIPLINE
UNITED STATES PATENT AND TRADEMARK OFFICE

LIMITED RECOGNITION UNDER 37 CFR § 10.9(b)

Rex Huang is hereby given limited recognition under 37 CFR § 10.9(b) as an employee of the Fish & Richardson P.C. law firm to prepare and prosecute patent applications wherein the patent applicant is the client of the Fish & Richardson P.C. law firm, and the attorney or agent of record in the applications is a registered practitioner who is a member of the Fish & Richardson P.C. law firm. This limited recognition shall expire on the date appearing below, or when whichever of the following events first occurs prior to the date appearing below: (i) Rex Huang ceases to lawfully reside in the United States, (ii) Rex Huang's employment with the Fish & Richardson P.C. law firm ceases or is terminated, or (iii) Rex Huang ceases to remain or reside in the United States on an H1B visa.

This document constitutes proof of such recognition. The original of this document is on file in the Office of Enrollment and Discipline of the United States Patent and Trademark Office.

Expires: May 16, 2004

Harry I. Moatz
Director of Enrollment and Discipline